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April 29, 2020

Via ECF

Hon. John F. Keenan United States District Judge United States Courthouse 500 Pearl Street New York, New York 10007



Re:

United States v. Brandon Lopez

20 Cr. 230

Dear Judge Keenan:

I represent Brandon Lopez. I write to the Court for two reasons: 1) to consent to the exclusion of time while this matter has been adjourned during the COVID-19 pandemic, and 2) to request a brief enlargement of Mr. Lopez's bail conditions, as outlined below.

Initially, Mr. Lopez and I have discussed the matter and he agrees to the exclusion of time from April 15, 2020 to the current adjourned conference date of June 23, 2020.

In addition, Mr. Lopez is moving into a new residence that has been approved by Pre-Trial Services. I apologized for the short notice, but we are requesting that he be allowed to travel from his current residence to a storage facility at 1425 Bruckner Boulevard in the Bronx with his belongings on April 30, 2020, and from the storage facility to his new residence at 2885 Briggs Avenue in the Bronx on May 1, 2020. Mr. Lopez will inform Pre-Trial Services Officer Joshua Rothman of his whereabouts at all times during the move.

I have spoken to AUSA Jacob Warren and he does not object.

Thank you for your consideration.

REWO ENDORSE

The Government having no objection, Defendant's request is GRANTED. Mr. Lopez is to keep Pretrial Services informed of his whereabouts at all times during the move.

SO ORDERED.

Dated: New York, New York

April 30, 2020

John F. Keenan

United States District Judge

Peter E. Brill
David Gray
Mitchell Hirsch*
Rita Bonicelli*
Matthew Halcken*
James Moschella*
*Of Counsel